



A TRADITION OF LEGAL EXCELLENCE SINCE 1938

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Application Granted. The deadline to submit a joint pre-trial order is extended to May 25, 2021. The final pre-trial conference scheduled for May 25, 2021 is adjourned to June 8, 2021 at 11:00 a.m. The dial-in number is 888-363-4749, passcode 3070580.

Michael J. Crowley
Partner

May 4, 2021

VIA ELECTRONIC FILING

The Honorable William H. Pauley III
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, New York 10007

Re: **Brenda Montanez v. Target Corporation, Docket No.: 1:19-cv-2173-WHP**

Dear Judge Pauley:

We are the attorneys for the defendant Target Corporation in the referenced matter. Presently a Joint Pretrial Order is to be filed in this matter on May 11, 2021. After consultation with plaintiff's counsel yesterday I am writing to request a two-week extension of time for this filing. We request the new filing date be scheduled for May 25, 2021 and that the Court adjourn the scheduled conference from May 25th to a new date convenient to Your Honor's calendar.

The reason for this request is that my associate who was working on the material for this submission unfortunately had a sudden death in her family which required her to travel to the Midwest to be with family. As I write this letter I am uncertain as to her date of return to the office. I discussed the situation with Mr. Hupart and he has no objection to our request for an extension of time.

Additionally, for Your Honor's information, plaintiff's counsel and I have been discussing restarting the mediation process previously scheduled but canceled when it was believed the plaintiff was having surgery. At this point the plaintiff has not had the anticipated surgery so I offered Mr. Hupart the opportunity to mediate if his client so desires. Counsel is discussing the matter with plaintiff and we will advise the Court if a new mediation is scheduled.

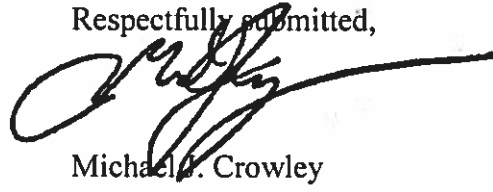
Dated: May 6, 2021
New York, New York

SO ORDERED:

A handwritten signature in blue ink, appearing to read 'William H. Pauley III', is written over a horizontal line.
WILLIAM H. PAULEY III
U.S.D.J.

We appreciate Your Honor's consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael A. Crowley", with a long horizontal flourish extending to the right.

Michael A. Crowley

cc: Krieger, Wilansky & Hupart, Esqs. (via ECF)